

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
MICHAEL A. HORN, aka MIKE A. HORN	:	CASE NO. 1-17-02237-HWV
PATRICIA L. HORN, aka Patty A. HORN	:	
dba PATTY HORN CLIPPER CUTS	:	CHAPTER 13
Debtors	:	
:		
THE BANK OF NEW YORK MELLON	:	
TRUST COMPANY, N.A., as Indenture	:	
Trustee of the GMACM Home Equity Loan-	:	
Backed Certificates, Series 2006-HE5	:	
Movant	:	
:		
v.	:	
:		
MICHAEL A. HORN, aka MIKE A. HORN	:	
PATRICIA L. HORN, aka Patty A. HORN	:	
dba PATTY HORN CLIPPER CUTS	:	
Respondents	:	

**DEBTORS' RESPONSE TO MOTION OF
THE BANK OF NEW YORK MELLON TRUST COMPANY, N.A.,
AS INDENTURE TRUSTEE OF THE GMACM HOME EQUITY
LOAN-BACKED CERTIFICATES, SERIES 2006-HE5
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come Debtors, Michael A. Horn and Patricia L. Horn, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted in part and denied in part. Debtors have no knowledge. Strict proof is demanded.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. Debtors have no knowledge as to the holder of the mortgage. Strict proof is demanded.
5. Admitted.

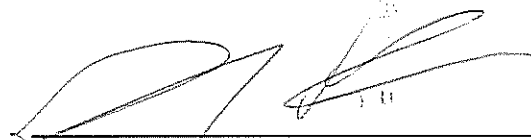
6. Denied. Debtors believe that they have made all post-petition payments. Strict proof is demanded.

7. Admitted in part and denied in part. See response to paragraph 6.

8. Admitted.

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum
Attorney I.D. No. 42606
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Attorney for Debtors

DATED: 12/3/18

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF THE BANK OF NEW YORK MELLON TRUST COMPANY, N.A., AS INDENTURE TRUSTEE OF THE GMACM HOME EQUITY LOAN-BACKED CERTIFICATES, SERIES 2006-HE5 FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J DEHART III ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

dehartstaff@pamd13trustee.com

JAMES C. WARMBRODT, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

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For Debtors

DATED: 12/3/18